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Affidavit

I, Lynn Bilko (“Affiant”), a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I am a Federal Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and have been since June 2009, assigned to the FBI Violent Crime Task Force (VCTF) Cleveland (Ohio) Division. I have been a sworn Law Enforcement Officer with the State of Ohio, employed by the City of Cleveland (Ohio), Division of Police since August 1999. I have the authority to make both Federal and State arrests and have received training in the investigation of criminal violations of the United States Code and the Ohio Revised Code. I have received training in and conducted investigations of numerous Federal and State criminal offenses including but not limited to kidnappings, robberies, homicides, narcotic offenses, crimes against children, and other violent crimes. I have gained experience through training at the State of Ohio Peace Officers Training Academy (OPOTA) and everyday work related to these types of investigations.
2. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code Section 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code Section 2516.
3. This affidavit is being submitted for the limited purpose of establishing probable cause that Chelsea Perkins, age 31, of Pensacola, Florida, has violated Title 18, United States Code Section 1111(a), Murder. The statements contained in this affidavit are derived from information provided to me by members of the National

Park Service Police Department, Ohio Bureau of Criminal Investigation (BCI), and the Valley View Police Department (VVPD), as well as my own investigation of this matter. This affidavit includes only those facts that I believe are necessary to establish probable cause and does not include all the facts uncovered during the investigation.

4. The court has jurisdiction to issue the complaint and arrest warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is in the Northern District of Ohio, a district court of the United States that has jurisdiction over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

JURISDICTION

5. This investigation concerns violations of 18 U.S.C. §§ 7(3) and 1111(a) and (b), relating to the murder of the victim identified below.
 - a. 18 U.S.C. § 7(3) defines “special maritime and territorial jurisdiction of the United States” to include “any lands reserved or acquired where the use of the United States, and under the exclusive or concurrent jurisdiction thereof.”
 - b. 18 U.S.C. §§ 1111(a) and (b) together prohibit any individual within the special maritime and territorial jurisdiction of the United States from committing the unlawful killing of a human being with malice aforethought.

PROBABLE CAUSE

6. On Tuesday, March 9, 2021, at approximately 11:00 a.m., the VVPD responded to the Terra Vista Natural Study Area within the Cuyahoga Valley National Park regarding the discovery of a deceased male. The deceased male was located by a group of hikers near the “Terra Vista Cemetery.” This location is on fee simple lands

owned by the United States Government and managed and controlled by the U.S.

Department of the Interior, National Park Service. Cuyahoga Valley National Park is within the “territorial jurisdiction” of the United States Government as defined in 18 U.S.C. § 7(3) and is located within the Northern District of Ohio, Eastern Division.

7. Officers found the decedent’s identification card in his pocket and identified the male as M.J.D. (initials used to protect the decedent's identity). He was wearing black fingerless gloves, black leather jacket, black hoodie, black jeans, and black boots. Police also located a plastic Aquafina water bottle next to M.J.D.’s body.
8. M.J.D.’s body was taken to the Cuyahoga County Medical Examiner’s Office for an autopsy, where it was determined that the manner of death was a single gunshot wound to the back of his head. The cause of death was ruled a homicide.
9. Affiant’s investigation revealed that on March 5, 2021, four days before his body was discovered, M.J.D. was out with co-workers at a bar and restaurant called the Tiki Underground, which is located at 5893 Akron Cleveland Road, Hudson, Ohio. While there, M.J.D. told his supervisor that he was going to meet a girl who was staying the weekend in the area.
10. At approximately 5:46 p.m., video surveillance from the Ohio Turnpike toll plaza shows a white Smart Car exit the Ohio Turnpike (Interstate 80) through the Akron toll plaza at Exit 180. This exit leads to State Route 8, which is a road that heads south toward the direction of the Tiki Underground Bar.
11. At approximately 6:00 p.m. on March 5, M.J.D. received a text and said to his co-workers, “she’s here.” M.J.D. and his supervisor walked out of the Tiki

Underground, and the supervisor watched M.J.D. enter a small white or silver car.

M.J.D.'s supervisor described the driver of the car as a woman with brown hair.

12. Affiant's review of the video surveillance footage from Tiki Underground confirmed

M.J.D.'s presence that evening, and it showed the vehicle that M.J.D.'s supervisor reported seeing was a white Smart Car with an unknown license plate.

13. At approximately 6:13 p.m., video surveillance from a nearby BP gas station located

at 16 West Streetsboro Street in Peninsula, Ohio showed a small white vehicle with a black stripe arrive at the station. M.J.D. is observed on surveillance video entering the store and purchasing cigarettes, a red colored canned beverage, and a clear bottle of water with blue label, later determined to be Aquafina brand water.

14. Affiant reviewed information related to M.J.D.'s Google account, which enabled

Affiant to track M.J.D.'s GPS location and path of travel from the Tiki Underground, in Hudson, Ohio. Using M.J.D.'s GPS data, investigators were able to determine that, on March 5, 2021 at approximately 6:37 p.m., M.J.D. traveled near a license plate reader (LPR) near Cedar and Richmond Roads in Cleveland, Ohio. The LPR captured a photograph of the rear of a white Smart Car, bearing a Virginia license plate no.

UPG-2702, that passed the intersection at approximately the same time that GPS data from M.J.D.'s phone indicated he was in that area. The LPR photograph also shows stickers on the rear of the vehicle, specifically a "U.S. Coast Guard" sticker in the top center of the rear back glass, a "Bauhaus" sticker located on the bottom center of the rear back glass, and a "Virginia is for Lovers" sticker below the license plate.

15. The owner of the white Smart Car was John Robert Perkins of Arlington, Virginia, a member of the United States Coast Guard. His wife, Chelsea Perkins, matched the description provided by M.J.D.'s supervisor as the female who picked up M.J.D. from the Tiki Underground Bar as described above in Paragraph 9.
16. GPS data from M.J.D.'s phone showed that he arrived in the area near 1433 Ashbury Avenue, in Cleveland, Ohio. Affiant learned of an Airbnb at that location. Affiant learned the reservation for the room was made for March 5, 2021, under the name Chelsea Perkins, and reserved using a credit card belonging to Chelsea Perkins.
17. GPS data from M.J.D.'s phone then showed, at approximately 8:00 p.m., movement from the AirBnb at 1433 Ashbury Avenue to a nearby Potbelly Sandwich shop on Euclid Avenue. Surveillance footage from a Verizon Wireless store on Euclid Avenue shows a woman with dark hair wearing dark clothes and dark colored knee-high boots walking east on Euclid Avenue next to a male wearing black clothes with patches on his jacket. The images in this surveillance footage appear to match the descriptions for Chelsea Perkins and M.J.D.
18. GPS from M.J.D.'s phone later showed that he returned to the Airbnb at 1433 Ashbury Avenue that evening, where he stayed until the following morning. That evening, Chelsea Perkins used Facebook messenger to communicate with her tattoo artist about her plan to travel to Detroit, Michigan the following day. In making this plan, Perkins told her tattoo artist that she was at an Airbnb in Cleveland and that check out was at 10:00 a.m. on March 6, 2021. Perkins said she was making a stop first, then heading to Detroit, where the artist was located, to get the tattoo. Perkins

also posted a photo of herself on Twitter that shows the interior of the Airbnb at 1433 Ashbury Avenue, Cleveland, Ohio.

19. On the morning of March 6, 2021, M.J.D. texted his girlfriend, identified herein as “A.W.,” that he had just woke up, was going to donate plasma, and would come back to their apartment. M.J.D. asked A.W. not to be upset and said he did not “sleep with her.” At approximately 8:39 a.m., M.J.D. texted A.W. again saying that he was “guessing” that she (his girlfriend) did not miss him and was mad at him last night. M.J.D. said further: “Well I pissed this chick off anyway so I hope yer happy.”
20. On March 6, 2021, at approximately 9:03 a.m., GPS data from M.J.D.’s phone showed movement from the Ashbury Avenue location. M.J.D. travelled south on Brecksville Road. At approximately 9:11 a.m., M.J.D.’s phone searched Google for the location of Terra Vista Natural Study Area. At approximately 9:45 a.m., GPS data showed that M.J.D.’s phone arrived at Terra Vista Natural Study Area in Cuyahoga Valley National Park. GPS records obtained by law enforcement from Perkins’ phone revealed that Perkins’ phone pinged off a tower just to the east of the Terra Vista Natural Study Area at approximately 9:59 a.m. At approximately 10:29 a.m., M.J.D. sent a text to his girlfriend saying “OK. I’ll see you in a little while.”
21. At approximately 10:30 a.m., another couple, “Couple 2”,¹ interviewed but not identified herein, arrived at the Terra Vista National Study area parking lot. Couple 2 noticed a white Smart Car with a military bumper sticker (among other bumper stickers) parked, unoccupied, in the parking lot. Couple 2 reported hiking in the area.

¹ This couple is identified as “Couple 2” as M.J.D. and Perkins were also together in the same area at this time and would be considered collectively as “Couple 1.”

Between 11:30 a.m. and 11:50 a.m., Couple 2 heard a gunshot. Couple 2 decided to leave the area. At approximately 12:10 p.m., Couple 2 returned to the Terra Vista National Study parking lot, where they saw the same white Smart Car still parked in the same place as before. Around the same time that Couple 2 reported returning to their vehicle, Perkins' cell phone pinged off a cell tower just west of the Terra Vista Study Area.

22. Another couple, "Couple 3,"² interviewed but not identified herein, was hiking near the Terra Vista Study Area on March 6, 2021, where they encountered a young woman in the woods. She told Couple 3 that she was looking for the cemetery and became lost. Couple 3 found it odd that the woman was not dressed in hiking attire; rather she was wearing all black clothing, black knee-high boots, and a black hoodie. Couple 3 further described the woman as having dark shoulder length hair. Couple 3 also stated that the woman seemed confused and expressed no emotion. Couple 3 stated that they walked with the woman a short distance until their path split. Couple 3 reported that the woman headed toward the direction of the cemetery.

23. Turnpike E-Z Pass records show that, on March 6, 2021 at approximately 1:00 p.m., the same white Smart Car entered the Ohio Turnpike (Interstate-80) at the North Ridgeville, Ohio entrance. The records show the car headed west toward Toledo. In Toledo, the white Smart Car turned north toward Michigan and ultimately arrived at "Family Ink," a tattoo parlor, located at 4219 Highland Road in Waterford Twp., Michigan, 48328.

² "Couple 3" are separate individuals from those previously identified as Couple 2 and Couple 1 (M.J.D. and Perkins).

24. E-Z Pass records show the white Smart Car register at Turnpike toll plazas heading east from Michigan in the early morning hours of March 7, 2021. The same car registered at toll plazas heading east through Ohio. On March 7, 2021, at approximately 4:45 a.m., the car registered as exiting the Turnpike in Somerset, Pennsylvania.
25. BCI analyzed M.J.D.'s body and other evidence collected near where the body was found. BCI's testing identified the presence of each of Perkins' and M.J.D.'s DNA on the mouth and exterior cap of the Aquafina bottle found next to M.J.D.'s body. Perkins' DNA was the major contributor on M.J.D.'s pubic hair, and her DNA was also present in his fingernails.
26. The autopsy report following the medical examiner's office examination of M.J.D.'s body and other collected evidence revealed that M.J.D. died as a result of a gunshot wound to the back of his head. The autopsy report stated that the manner of death was homicide. The report concluded that the bullet recovered from M.J.D.'s head was a 9mm caliber round of ammunition.
27. On March 17, 2021, agents with the United States Park Services conducted surveillance at the home of Chelsea and John Perkins in Arlington Virginia. Agents located the white Smart Car parked in front of their apartment complex and noticed that two of the distinctive bumper stickers had been removed, including the "Virginia is for Lovers" sticker.
28. On March 30, 2021, investigators executed a search warrant of Perkins' home in Arlington, Virginia. Pursuant to the search warrant, law enforcement recovered three 9mm pistols (one Glock and two Springfield Armory). One of the Springfield

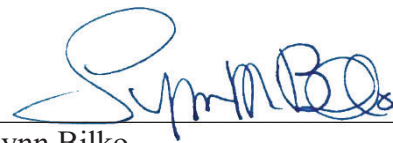
Armory pistols was recovered inside a woman's purse/backpack, which also contained an identification card for Chelsea Perkins. Each of these firearms was test-fired by BCI and examined for DNA.

29. A second report issued by BCI determined that Perkins' DNA was the major source of DNA on the 9mm Springfield Armory pistol recovered the purse/backpack during the March 30, 2021 execution of the search warrant.

30. BCI issued a ballistics report that compared the markings on the bullet recovered from M.J.D.'s head with the test fired bullets from the recovered Glock pistol and the two Springfield Armory pistols. The report determined that the markings on the bullet recovered from M.J.D.'s head had similar characteristics as the markings from rounds fired from the Springfield Armory pistols, but not the same characteristics as the markings from rounds fired from the Glock pistol.


Conclusion

31. Based on the preceding, I believe that probable cause exists that Chelsea Perkins has violated Title 18 USC Section 1111(a), Murder.


Lynn Bilko
Task Force Officer
Federal Bureau of Investigation

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Crim. R. 41(d)(3) this 8th day of December 2021.




David A. Ruiz
United States Magistrate Judge